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8 Bondars Logistics, LLC
9

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA
12

13 JAIME MENDOZA HERNANDEZ,
14 Plaintiff,
15

Case No. 3:18-cv-00427-RCJ-WGC

16 vs.

STIPULATION AND ORDER TO EXTEND
TIME FOR EXPERT WITNESS DISCLOSURE;
LR IA 6-1; LR IA 6-2; LR II 26-4

17 BONDARS LOGISTICS, LLC, a
18 California Limited Liability Company;
19 DOES 1-25; and BLACK CORPORATION
20 A-Z,
21

22 Defendant(s).
23 _____/

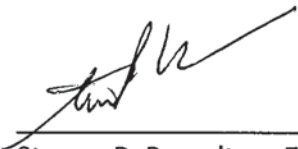
24 Plaintiff JAIME MENDOZA HERNANDEZ and Defendant BONDARS LOGISTICS, LLC, by
25 and through their undersigned attorneys of record, hereby stipulate and agree to extend only
26 the deadline to disclose expert witnesses from March 7, 2019 to March 28, 2019; and the
27 deadline to disclose rebuttal expert witnesses from April 8, 2019 to April 25, 2019. The parties
28 agree that good cause does exist for extension of the above deadlines because (1) Plaintiff is
seeking a second medical opinion regarding possible future medical treatment, and (2)
Defendant is also further investigating the accident location and forklift involved in the
accident on a date mutually agreeable to the parties. This realization that the requested

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1 extension is appropriate occurred when the parties' counsel conferred during the deposition
2 of Plaintiff on February 21, 2019, and both parties' counsel subsequently spent the following
3 week coordinating dates with experts, their respective calendars, and Plaintiff's former
4 employer. This is the first request for extension of time since the Court's November 8, 2019
5 Case Management Conference, and the parties have been diligent in discovery that has
6 included exchanging written discovery requests and deposing three witnesses, including
7 Plaintiff. It is not anticipated that the new expert disclosure dates will otherwise impact the
8 court's previously adopted scheduling order.
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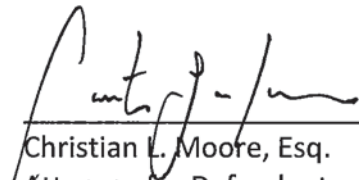
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11 Dated: March 1, 2019
12 Law Offices of Steven P. Brazelton
13 520 Holcomb Avenue
14 Reno, Nevada 89502

15 By:

16 
17 Steven P. Brazelton, Esq.
18 Attorney for Plaintiff

Dated March 1, 2019
Lemons, Grundy & Eisenberg
6005 Plumas Street, Third Floor
Reno, Nevada 89519

By:

19 
20 Christian L. Moore, Esq.
21 Attorney for Defendant

22
23 **IT IS SO ORDERED.**

24 Dated: March 4, 2019

25 
26 WILLIAM G. COBB
27 UNITED STATES MAGISTRATE JUDGE
28